

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	[PROPOSED] REVISED CASE
CORRECTIONS CORPORATION OF)	MANAGEMENT ORDER
AMERICA, et al.,)	
Defendants.)	
_____)	

Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), and Defendants CoreCivic, Inc., formerly known as Corrections Corporation of America (“CoreCivic” or the “Company”), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin (collectively, “Defendants”) (together, the “Parties”), submit the following [Proposed] Revised Case Management Order.

WHEREAS, under the current case management order (ECF No. 238), the deadline to declare experts and produce expert reports is July 31, 2020;

WHEREAS, additional documents were recently produced by the Federal Bureau of Prisons, and the Parties have been working to complete certain depositions by July 31, 2020;

WHEREAS, the Parties agree that a short extension to the expert disclosure deadlines, and no other deadlines, will allow the Parties to efficiently complete their depositions and disclosures and will cause no prejudice; and

WHEREAS, the Parties reserve the right to seek additional modifications of the case schedule if such modifications become necessary;

NOW, THEREFORE, subject to approval of the Court, the Parties agree on the following deadlines to govern the remainder of the case:

Matter	Existing Date	New Date
The Parties Declare Experts and Produce Expert Reports Pursuant to Fed. R. Civ. P. 26(a)(2)	July 31, 2020	August 7, 2020
• Rebuttal	September 11, 2020	September 18, 2020
• Completion of Expert Depositions	October 2, 2020	<i>No change</i>
Dispositive & <i>Daubert</i> Motions		
• Opening Briefs	November 13, 2021	<i>No change</i>
• Oppositions	January 15, 2021	<i>No change</i>
• Replies	February 19, 2021	<i>No change</i>
Information Exchange	April 13, 2021	<i>No change</i>
Motions <i>in Limine</i>	April 16, 2021	<i>No change</i>
Motion <i>in Limine</i> Responses	April 27, 2021	<i>No change</i>
Pretrial Filings	April 27, 2021	<i>No change</i>

Matter	Existing Date	New Date
Pretrial Order	April 27, 2021	<i>No change</i>
Pretrial Conference	April 30, 2021	<i>No change</i>
Trial	May 18, 2021	<i>No change</i>

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ALETA A. TRAUGER
UNITED STATES DISTRICT JUDGE

Submitted by:

DATED: July 29, 2020

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on July 29, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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Manual Notice List

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